

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 03-60

Respondent:

Title:

REQUEST: Conversent Communications of Massachusetts, LLC, Set #9

DATED: February 13, 2003

ITEM: Conversent 9-1 What is the rate that the DTE approved in Docket 01-20 (but which has not yet been allowed to go in effect) for non-WPTS hot cuts for 2 wire analogue loops, for both initial and additional loops?

REPLY: Verizon MA objects to the discovery request on the basis that it seeks information that is as readily available to the requesting party as it is to Verizon MA.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 03-60

Respondent: Carleen Gray

Title: Manager – Product Development

REQUEST: Conversent Communications of Massachusetts, LLC, Set #9

DATED: February 13, 2003

ITEM: Conversent 9-2 Do you agree that the rate that Verizon proposed for a WPTS hot cut for a 2 wire analogue loop in a revised compliance filing in Docket 01-20 dated June 12, 2003 was \$42.65 for the first loop and \$31.98 for additional loops?

REPLY: Yes.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 03-60

Respondent: Carleen Gray
Title: Manager-Product Development

REQUEST: Conversent Communications of Massachusetts, LLC, Set #9

DATED: February 13, 2003

ITEM: Conversent 9-3 Do you agree that the rate for a WPTS hot cut for a 2 wire analogue loop that Verizon is proposing in this Docket is \$73.78 for the first loop and \$37.23 for additional loops?

REPLY: Yes. Per the Exhibit Supp-III Cost Model, the proposed non-recurring charge to perform a Basic Hot Cut utilizing WPTS is as follows (assuming no IDLC and no dispatch required):

Service Order charge \$20.53
C. O. Wiring initial line \$37.37
Provisioning initial line \$15.88
C.O. Wiring additional line \$21.30
Provisioning additional line \$15.93

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager-Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC, Set #9

DATED: February 13, 2003

ITEM: Conversent 9-4 Please identify all of the differences in methodology, inputs and assumptions between the WPTS cost study filed in Docket 01-20 on or about June 12, 2003 and the WPTS cost study filed in this Docket that cause the rate for WPTS hot cuts to increase from \$42.65 (initial) and \$31.98 (additional) to \$73.78 (initial) and \$37.23 (additional). Please provide a copy of all work papers that show such differences.

REPLY: Verizon MA objects to this Interrogatory to the extent that it requests that Verizon MA identify "all of the differences in methodology, inputs and assumptions" between the two specified studies and provide a copy of "all work papers that show such differences," on the grounds that identifying "all" such differences and providing "all" such workpapers would be unduly burdensome.

Subject to and without waiving its objection, Verizon MA responds as follows:

Please see Verizon MA's reply to CONV-VZ 9-5. The WPTS Hot Cut UNE cost study filed in Docket 01-20 was modified to meet the Department's requirements in its May 29, 2003 Order on Verizon MA's Compliance Filing. The \$42.65 (initial) and \$31.98 (additional) WPTS Hot Cut costs reflect a significant number of reductions ordered by the Department to work times, Typical Occurrence Factors and Forward-Looking Adjustment Factors for work activities in each of the work centers.

REPLY (Cont'd):

Since the \$73.78 (initial) and \$37.23 (additional) WPTS Hot Cut costs submitted in Verizon MA's December 17, 2003 Supplemental Initial Panel Testimony reflect new input data, the reductions specified in the D.T.E. 01-20 Compliance Order would not apply in Verizon MA's new Hot Cut Non-Recurring Cost Model, Exhibit Supp-III.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager-Service Costs

REQUEST: Conversent Communications of Massachusetts, LLC, Set #9

DATED: February 13, 2003

ITEM: Conversent 9-5 Please identify all of the differences in methodology, inputs and assumptions between the non-WPTS hot cut cost study that was approved in Docket 01-20 and the WPTS cost study that was filed in this docket. Also, please explain in detail all changes that were made to the WPTS cost study that reflect a more efficient, less manually intensive and less expensive process associated with WPTS. Please provide a copy of all work papers that show such difference and changes.

REPLY: Verizon MA objects to this Interrogatory to the extent that it requests that Verizon identify "all of the differences in methodology, inputs and assumptions" between the two specified studies and provide a copy of "all work papers that show such differences and changes," on the grounds that identifying "all" such differences and providing "all" such workpapers would be unduly burdensome.

Subject to and without waiving its objection, Verizon MA responds as follows:

Verizon MA first filed its Wholesale Non-Recurring Cost Model ("NRCM") in Massachusetts in Docket 01-20 on May 8, 2001. Basic (non-WPTS) hot cut UNE costs were included in that cost study filing. The non-WPTS hot cut costs were developed in a fashion similar to the process described for the new WPTS hot cut costs in the instant proceeding. Work activities were identified for the appropriate work centers from process flow descriptions, work times for each activity were obtained via surveys, Typical Occurrence Factors were obtained from the supervisors of the

REPLY (Cont'd):

workers, Forward-Looking Adjustment Factors were assigned by key Subject Matter Experts (“SMEs”) in a position to know of planned process improvements or mechanization efforts, and hourly labor rates were developed for the workers’ Job Function Codes from annual functional accounting data. These inputs were used in the NRCM to calculate the non-recurring charges approved by the Department in D.T.E. 01-20.

On February 27, 2003, Verizon MA supplemented its NRCM in D.T.E. 01-20 to comply with the Department’s July 11, 2002 UNE Order that Verizon MA develop a less costly alternative to the non-WPTS hot cuts. New costs for the (then) newly proposed option for WPTS hot cuts were submitted. While a complete modeling of the WPTS hot cut costs was not possible under the limited time constraints of the Department’s schedule for compliance, Verizon MA was able to utilize the expertise of its SMEs to estimate the forward-looking impact of the new WPTS option for hot cut non-recurring costs. It was anticipated that the application of the WPTS process would significantly reduce the time required by the RCCC. Based on discussions with the SMEs, the total manual effort associated with WPTS option hot cuts was estimated as 10% of the total connect time shown for the RCCC in all hot cuts except IDLC-to-Copper hot cuts. For IDLC-to-Copper hot cuts, the total manual effort was estimated at 25%. In addition, two activities associated with the central office frame involved direct communication with the RCCC. When the activity consisted solely of communications (i.e., receiving notification of a pending hot cut – Activity Number 1), the activity was zeroed out. When the activity included checking for dial tone and reporting back to the RCCC (Activity Number 5), the activity time was halved. Furthermore, in recognition that the WPTS notification functionality could one day be extended to the RCMAC, Verizon MA halved work Activity Number 1 associated with the RCMAC, which entailed obtaining direct notification from the RCCC.

As described on page 9 in Section III of its December 17, 2003 Supplemental Initial Panel Testimony, Verizon MA utilized its new Hot Cut NRC Model to calculate new WPTS two- and four-wire basic hot cuts. The development of the new Hot Cut NRC Model is described in Verizon MA’s November 14, 2003 Initial Panel Testimony, Section III.B.